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Counsel for Plaintiff Westell Technologies, Inc.

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

 Trong Nguyen, Inc. on behalf of itself and)
 and all others similarly situated,)
)
 Plaintiff,)
 v.)
 Samsung Electronics Co., Ltd., et al.,)
 Defendants.)

Case No. C-07-0086-SBA

**ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER CASES
 SHOULD BE RELATED**

The Honorable Sandra B. Armstrong

THIS DOCUMENT RELATES TO:)
 Case No. C-07-4944-BZ)
)
 WESTELL TECHNOLOGIES, INC., on)
 behalf of itself and all others similarly)
 situated,)
 Plaintiff,)
 v.)
 Samsung Electronics Co., Ltd., et al.,)
)

PLAINTIFF WESTELL TECHNOLOGIES, INC.'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES
 SHOULD BE RELATED [Case No.: C-07-0086-SBA]

Defendants.)

Pursuant to Local Rule 3-12 ("Related Cases"), Plaintiff WESTELL TECHNOLOGIES, INC. submits this administrative motion to consider whether the present case (Case No. C-07-4944-BZ) should be related to *Nguyen v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-0086-SBA, presently pending before this Court. In support of this motion, plaintiff states:

1. Both the *Westell* and the *Nguyen* actions allege that many of the same Defendants violated federal antitrust law by illegally fixing the prices of Flash Memory products. Plaintiffs in *Westell* and *Nguyen* both raise claims for violations of the Sherman Antitrust Act, 15 U.S.C. §

1. The *Nguyen* case was the earliest filed case to assert these claims.

2. By Orders dated March 14, April 27, May 14, June 12, August 2, August 13 and August 21, 2007, the Court related the following additional matters to *Nguyen v. Samsung Electronics Co., LTD., et al.*, Case No. C 07-0086-SBA:

- i. *A Computer Place, Inc. and Timothy Chanda v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1020-WHA.
- ii. *Miller v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1147 EDL.
- iii. *Burke v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1236 MJJ
- iv. *Perkins v. Samsung Electronics Co. Ltd., et al.*, Case No. C-07-1360-JL.
- v. *Burt v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1388-MMC.
- vi. *TechToysForLess v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1418-SC.
- vii. *Huh v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1459-JCS.
- viii. *Krahmer v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1460-SC.

- ix. *Alderman v. Samsung Electronics Co., Ltd., et al.*, Case No. C 07-01489 SBA.
- x. *Greenwell v. Samsung Electronics Co., Ltd., et al.*, Case No. C 07-01524 SBA.
- xi. *Sweatman v. Samsung Electronics Co., Ltd., et al.*, Case No. C 07-01613 SBA.
- xii. *Pellitteri v. Samsung Electronics Co., Ltd., et al.*, C 07-01614 SBA.
- xiii. *Kevin's Computer and Photo v. Samsung Electronics Co., Ltd., et al.*, C 07-01665 SBA.
- xiv. *Theisen v. Hitachi, Ltd., et al.*, Case No. C 07-01680 SBA.
- xv. *Davis v. Samsung Electronic Co., Ltd., et al.*, Case No. C 07-01735 SBA.
- xvi. *McClellan-Chambers et al. v. Samsung Electronics Co., Ltd., et al.*, Case No. C 07-01823 SBA.
- xvii. *Juskiewicz v. Samsung Electronics Co Ltd., et al.*, Case No. C 07-01829 SBA.
- xviii. *Rippel v. Samsung Electronics Co. Ltd., et al.*, Case No. C 07-02066 SC.
- xix. *Young v. Samsung Electronics Co., Ltd., et al.*, Case No. C 07-02286 MMC.
- xx. *Harrison v. Samsung Electronics Co., Ltd., et al.*, Case No. C 07-03971 VRW.
- xxi. *Skorstad v. Samsung Electronics Co Ltd., et al.*, Case No. C 07-02228 MEJ.

xxii. *Calif-Coast Investigative Services v. Lexar Media, Inc., et al.*, Case No. C 07-03775 EDL.

xxiii. *Cravens v. Lexar Media, Inc., et al.*, Case No. C 07-04082 MJJ.

3. All of these actions allege violations of antitrust law as a result of the Defendants' alleged nationwide price-fixing conspiracy of Flash Memory products.

4. Pursuant to Local Rule 3-12(a), plaintiffs state that the actions concern substantially the same parties and events, and that it appears likely that there will be an unduly burdensome duplication of labor and expense, or the possibility of conflicting results if the cases are conducted before different Judges. Relating the cases should help to eliminate duplicative discovery, prevent inconsistent pretrial rulings, and conserve the resources of the parties, their counsel, and the judiciary.

DATED: September 26, 2007

Respectfully submitted,

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